HAGENS BERMAN SOBOL SHAPIRO LLP

Steve W. Berman (*pro hac vice*) 1918 Eighth Avenue, Suite 3300 Seattle, Washington 98101

Telephone: 206-623-7292

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11

MOTORS LIQUIDATION COMPANY, et al., : Case No. 09-50026 (REG)

f/k/a General Motors Corp., et al. :

Debtors : (Jointly Administered)

:

NO STAY PLEADING

On June 1, 2015, this Court issued its Judgment related to the Court's Decision on Motion to Enforce Sale Order entered on April 15, 2015 (the "Judgment"). Doc. # 13177.

Paragraph 10(a) of the Judgment states that certain cases listed on Exhibit B of the Judgment are stayed. *Id.* at 4. Included on the list of impacted cases on Exhibit B of the Judgment is the case of *Hailes, et al. v. General Motors LLC, et al.*, No. 15PU-CV00412 filed in Pulaski County, Missouri. Counsel who represented the plaintiffs in *Hailes* have notified Co-Lead Counsel in the MDL that the action was voluntarily dismissed on May 19, 2015, prior to entry of the Judgment. A file stamped copy of the dismissal is attached as Exhibit A. Counsel who filed the *Hailes* matter have contacted counsel for General Motors, who acknowledge the dismissal was filed prior to the Judgment. To avoid confusion, counsel who previously represented the plaintiffs in *Hailes* request that the Judgment be amended to remove reference to the previously dismissed *Hailes* action.

Dated: June 24, 2015 Respectfully submitted,

/s/ Steve W. Berman

Steve W. Berman (pro hac vice)
HAGENS BERMAN SOBOL SHAPIRO LLP
1918 Eighth Avenue, Suite 3300
Seattle, Washington 98101
Tel.: 206-623-7292
steve@hbsslaw.com

On behalf of:

Don M. Downing, MO Bar #30405 Jason D. Sapp, MO Bar #58511 GRAY, RITTER & GRAHAM, P.C. 701 Market Street, Suite 800 St. Louis, MO 63101 Telephone: (314) 241-5620 Facsimile: (314) 241-4140 ddowning@grgpc.com

Filing Counsel in Hailes et al. v. General Motors LLC, et al., No. 15PU-CV00412 (Pulaksi County, MO)

CERTIFICATE OF SERVICE

The undersigned certifies that on June 24, 2015, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all parties of record.

Dated: June 24, 2015

/s/ Steve W. Berman

Steve W. Berman (*pro hac vice*)
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1918 Eighth Avenue, Suite 3300
Seattle, Washington 98101

Tel.: 206-623-7292 steve@hbsslaw.com